

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

JOSHUA WALKER

Case No. 21 CR 392

Judge Mary M. Rowland

GOVERNMENT'S SENTENCING MEMORANDUM

In October 2021, defendant Joshua Walker was charged in a second superseding indictment with conspiracy to commit carjacking, in violation of Title 18, United States Code, Section 371 (Count One); carjacking, in violation of Title 18, United States Code, Section 2119 (Count Two); and using, carrying, and brandishing a firearm during and in relation to a crime of violence, namely carjacking, in violation of Title 18, United States Code, Section 2119, as charged in Count Two of the second superseding indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A) (Count Three). R.36. On February 5, 2025, defendant pled guilty to Counts Two and Three of the second superseding indictment via plea agreement. R.161; R.162. Defendant faces a sentencing guidelines range of 33 to 41 months imprisonment as to Count Two, followed by the mandatory consecutive 7 years' imprisonment as to Count Three (PSR ¶¶100-102). In accordance with the 18 U.S.C. § 3553(a) factors, the government recommends a mid-range guidelines sentence of 38 months' imprisonment as to Count Two, followed by the mandatory consecutive 7 years' imprisonment as to Count Three, totaling 122 months' imprisonment, as well as 5 years' supervised release, and a \$200 special assessment.

I. BACKGROUND

The factual background is taken from the presentence investigation report (PSR), the plea agreement, and the government's version of the offense (GVO).

Offenses of Conviction (Counts Two and Three)

As outlined in the plea agreement (R.162), at approximately 6:36 a.m. on January 20, 2021, defendant carjacked Victim A at gunpoint on the 200 block of S. Wacker Drive in Chicago. Victim A, a driver for a ride share service, was parked in his running Mitsubishi in front of a building on the 200 block of S. Wacker Drive (Willis Tower) after having dropped off a customer. An individual, driving a stolen Dodge Journey, drove up and stopped in front of Victim A's vehicle. Defendant, wearing a mask, jumped out of the front passenger side of the Dodge Journey and went to the driver's side of Victim A's vehicle. Defendant pointed a firearm at Victim A and demanded Victim A exit the vehicle and give defendant Victim A's phone. Victim A exited his vehicle and gave his cell phone to defendant. Defendant got into Victim A's vehicle and drove away.¹ This armed carjacking was captured on surveillance footage. GVO Exhibit 1.

Defendant drove Victim A's car to defendant's residence in Chicago, Illinois and subsequently attempted to sell Victim A's phone at a Boost Mobile store. A few hours after committing this armed carjacking, defendant posted a status on his Facebook account, which stated, "Can't be scared to take a life" and "we already taking risks" as depicted below:

¹ Victim A's vehicle, a 2011 Mitsubishi Outlander SUV with vehicle identification number JA4AP4AU0BZ024591, had been transported, shipped, or received in interstate commerce.

Posted 2021-01-20 14:16:52 UTC

Status Can't be scared to take a life 🦋👹 we already taking risks 😂👤👤👤 #Goodmorning

Mobile true

Id 694353637924020|

Other Aggravating Factors

In addition to committing the violent carjacking of Victim A at gunpoint, which, standing alone, is more than sufficient to justify the guidelines sentence the government is seeking, defendant is subject to multiple other aggravating factors:

Beamteam Gang & Unlawful Possession of Firearms

Beyond the facts defendant admitted to in his plea agreement, first, defendant is a member of the Beamteam gang, a violent criminal street gang from the North Lawndale neighborhood of Chicago. The 1200 block of Lawndale was (at the time) a known hangout of the Beamteam gang, resulting in multiple references to “1200” as one of the symbols for the gang (see reference below to the location of defendant’s April 7, 2021 arrest on the 1200 block of Lawndale). Below are examples of posts by defendant on Facebook referencing “1200,” Beamteam, the “opps” or opposition gang, and “B” for Beamteam:

Author Joshua Moore (Facebook: 100020481704727)

Sent 2020-12-09 18:20:46 UTC

Body Bitch I'm 1200 BEAMTEAM Still thumbing J.C.G



Time 2021-01-31 07:45:56 UTC

Story Joshua Walker updated his profile picture.

Message ♥ 1200 BigJayoff Lawndale

Time 2021-02-08 11:28:25 UTC

Story Joshua Walker shared a memory.

Message my right hand Beamteam Lilfoe

Posted 2020-05-11 18:58:32 UTC

Status Forever 9 Fuck The Opps #FreeDaCleanUpCrew

Mobile true

Id 532816374077748

Author Joshua Walker (Facebook: 100020481704727)

Sent 2020-11-16 17:18:16 UTC

Body Aye gang if you come out today let me see the pipe bc bd sister letting opps come to the house and then his sister she get into with somebody from hob mob and shit then bd telled his og and she not saying she bc she don't be there

Posted 2020-04-12 16:41:00 UTC
Status HAPPY EASTER TO MY 10200000FAMILY00
Mobile true
Id 515748779117841



Photo ID 515748619117857



Photo ID 699819870710730
Id 699819870710730
Title ♥[1200] @[100061646677799:2048:BigJayoff Lawndale]
Link <https://www.facebook.com/photo.php?fbid=699819870710730&set=a.103532947006095&type=3>
Upload Ip 2600:1700:e440:17e0:804d:1c71:93c5:11c4
Album Name Profile Pictures
Uploaded 2021-01-31 07:45:56 UTC
Author Joshua Walker (100020481704727)
Taken Unknown
Tags **Subject Id** 100061646677799
Subject Name BigJayoff Lawndale
Creator Id 100020481704727



Photo ID

68470612888771

Id 68470612888771

Title Bitch I'm 10200000 00E00MTE00M Still thumbing J.C.G+0000

Link <https://www.facebook.com/photo.php?fbid=68470612888771&set=a.106344470058276&type=3>

Upload Ip 2600:1700:e440:17e0:6409:623f:5c00:5408

Album Name Mobile Uploads

Uploaded 2021-01-01 21:36:48 UTC

Author Joshua Walker (100020481704727)

Taken Unknown

Orientation 1

Tags



Photo ID
 684753662217351
Id 684753662217351
Title It's supposed to be 4 not 3 but I 4 my right hand
Link <https://www.facebook.com/photo.php?fbid=684753662217351&set=ea.1063444700582766&type=3>
Upload Ip 2601:241:8900:8d30:6409:623f:5c00:5408
Album Name Mobile Uploads
Uploaded 2021-01-02 00:05:20 UTC
Author Joshua Walker (100020481704727)
Taken Unknown
Orientation 1
Tags



Photo ID
 649636579062393
Id 649636579062393
Title Imma 1[2000] Baby[00]Nigga Welcome To The Zoo [00000] #HighKid[000]
Link <https://www.facebook.com/photo.php?fbid=649636579062393&set=ea.1063444700582766&type=3>
Upload Ip 2600:1700:e440:17e0:4944:3245:c168:15de
Album Name Mobile Uploads
Uploaded 2020-11-07 16:06:56 UTC
Author Joshua Walker (100020481704727)
Taken Unknown
Orientation 1
Tags
 Subject Id 100020481704727
 Subject Name Joshua Walker
 Creator Id 100020481704727
 Date Created 2020-11-07 16:06:57 UTC
 X 59
 Y 15
 Status active



Photo ID 637840803575304
 Id 637840803575304
 Title Happy Birthday gangster today yo day i know if you was here i know you was going step for your shit joe but you in a good place now i know you and all the guys looking down at them 1200 gangster but it's nothing but love and mfs miss you joe 1200 1200 It's going be zons type of day for me 1200 1200
 Link https://www.facebook.com/photo.php?fbid=637840803575304&set=a.1063444700592766&type=3
 Upload Ip 2600:1700:e440:17eb:d67:157c:7c2:c2bc
 Album Name Tagged photos
 Uploaded 2020-10-23 04:51:04 UTC
 Author Joshua Walker (100020481704727)
 Taken Unknown
 Orientation 1
 Tags
 Subject Id 100020481704727
 Subject Name Joshua Walker
 Creator Id 100020481704727
 Date Created 2020-10-23 04:51:05 UTC
 X 31
 Y 14
 Status active
 Subject Id 100010461992690
 Subject Name Makei Glo
 Creator Id 100020481704727
 Date Created 2020-10-23 04:51:05 UTC
 X 29
 Y 59
 Status active

In the below exchange, defendant requested a video be sent to him—that video features defendant in it and includes the “1200” stamp, and the video is attached here as Exhibit 1.

Author Joshua Walker (Facebook: 100020481704727)
Sent 2020-09-07 22:22:01 UTC
Body Send me this

Author Larreon Dwayne (Facebook: 100003855634713)
Sent 2020-09-07 22:40:11 UTC
Body Larreon sent a video.
Attachments video-1599518411.mp4 (316135352817656)
Type video/mp4
Size 1865927

The Beamteam gang’s name stems from the fact that members often use laser beams on the end of their firearms to not only engage in violence with rival gangs, but also violence against the community at large, primarily through armed carjackings and armed robberies. Multiple photographs posted on Facebook support

this. For example, on November 7, 2020, when an individual asked defendant to send a picture of his “strap” (*i.e.*, gun), defendant sent the below photo of a firearm with an extended magazine.



On December 9, 2020, defendant sent himself multiple photographs, including of those depicted below, one of defendant himself holding two firearms, defendant with other known Beamteam members, displaying firearms and flashing gang signs, another with defendant and other known Beamteam members holding up a firearm with an extended magazine, and other firearms with laser beams—an homage to the gang’s origin/name. Some of the references to Beamteam, 1200, and “B” are noted in other photographs and the video shown above as well.



That same day, there was a video depicting defendant holding a firearm (with other Beamteam members flashing firearms), GVO Exhibit 3, with the message shown

above of “Bitch, I’m 1200 BEAMTEAM Still thumbing, J.C.G.” As noted above, “1200” is one of the references to the Beamteam gang based on their known hangout on the 1200 block of Lawndale, as also corroborated by the location of defendant’s April 7, 2021 arrest on the 1200 block of Lawndale, outlined below. “J.C.G.” stands for Jay Corey Gang, another reference to Beamteam, referring to Jay and Corey who are deceased Beamteam members (note the tattoo that defendant bears above his right eyebrow which states “Corey” (PSI ¶84)). On January 7, 2021, less than three weeks before defendant committed the instant armed Willis Tower carjacking here, Facebook user “Solo Dolo,” another Beamteam member (Taevon Abston), sent defendant a video with defendant and another person dancing and pointing firearms at the camera, with defendant flashing gang signs and his gun. GVO Exhibit 4. On January 15, 2021, Solo Dolo sent defendant the below photograph of defendant in his laundry room pointing a firearm with a laser beam on the end.



At the time these photographs and videos were posted on Facebook, defendant unlawfully possessed firearms, not only due to his status as a convicted felon, but also due to his status of being on probation.

Details of Prior Convictions and Related Robberies: May 2019

Specifically, defendant was convicted of possession of a stolen vehicle and robbery for his involvement in a multi-victim violent robbery spree. R.35:5. According to the Chicago Police Department (CPD) arrest report, in May 2019, CPD was aware of a stolen white Jeep Cherokee that had been used in multiple robberies throughout the city. GVO Exhibit 11A:5; R.35:6. Upon locating that vehicle on May 15, 2019, at approximately 1:46 p.m., CPD engaged in a vehicle pursuit, which ended when defendant exited the stolen vehicle and tried to flee, but he was ultimately placed in custody. *Id.* One of the robbery victims identified defendant as the offender who struggled with her for control over the door of her vehicle, which resulted in her being dragged for nearly 10 meters as the driver was trying to flee (CPD RD# JC264106). *Id.* Another robbery victim also identified defendant as being present during the robbery in CPD RD# JC263353. GVO Exhibit 11A:5. The police report for CPD RD# JC264106 (referred to above) indicates that, on May 15, 2019, at 1:20 p.m. (less than 30 minutes before defendant's arrest as outlined above), the victim was standing on the sidewalk when an offender came out of that stolen white Jeep Cherokee and ripped her phone from her hand. GVO Exhibit 11B:3. The victim went after the offender to get her phone back and, as the offender's vehicle drove away, she grabbed the door handle, could not let go, and was dragged several feet until she let go of the handle. *Id.*; R.35:6 The victim indicated she could identify the offender, which,

according to the above arrest report, she identified as defendant. *Id.*; GVO Exhibit 11A:5. The victim was taken to the hospital and treated for abrasions. GVO Exhibit 11B:3. According to the police report for CPD RD# JC263353 (referred to above), on May 14, 2019, at 7:10 p.m. (the evening before defendant's arrest), the victim was standing at an intersection listening to music, when the offender ran up and stole her phone out of her hands and jumped into the driver's side of that stolen white Jeep Cherokee. GVO Exhibit 11C:2. The victim ran after the offender, braced herself against the driver's side door before the offender could close it, and a struggle ensued between the offender and the victim for control over her phone. *Id.* The offender managed to put the car into drive and flee, causing the victim to fall to her knees. *Id.* The victim indicated that she observed the passenger, who she later identified as defendant. *Id.*; GVO Exhibit 11A:5.

Related CPD reports indicate the following: first, on May 14, 2019, at 10:45 a.m., a woman reported that her white Jeep Cherokee was stolen while she was pumping gas at a gas station, which was the same vehicle used in the above robbery spree (CPD RD #JC264514). GVO Exhibit 11D:3. Second, on May 14, 2019, at 3:00 p.m., a victim indicated that while she was walking and talking on the phone, an offender came behind her and smacked the right side of her face and stole her phone (CPD RD #JC262845). GVO Exhibit 11E:3. The victim indicated that the offender took off in a white SUV. *Id.* Third, on May 14, 2019, at 6:15 p.m., a victim indicated that the white Jeep pulled up alongside her, and the passenger exited the vehicle and tried to grab her phone from her hand (CPD RD#JC263217). GVO Exhibit 11F:2. The victim began to fight the offender off, the offender grabbed her by her clothes, pushing

and pulling on her while screaming, “give me that shit.” *Id.* The victim continued to fight off the offender and when he could not get her phone, the driver yelled at the offender to get back in the car. *Id.* The offender got back in that stolen white Jeep and they fled. *Id.* A witness to this incident indicated that he observed another robbery by the same offenders just moments earlier (reported under CPD RD #JC263217, as outlined above). *Id.* Less than an hour later, at 7:10 p.m., another pedestrian phone robbery occurred, which was described already above, where defendant was identified as being the passenger in the stolen white Jeep Cherokee. GVO Exhibit 11C:2.

The following day, on May 15, 2019, at 1:20 p.m., the pedestrian phone robbery described above, where the victim was dragged by the stolen white Jeep, occurred. GVO Exhibit 11B:3. Fourth, two minutes later, on May 15, 2019, at 1:22 p.m., a victim reported that she was walking when an offender knocked her to the ground from behind and ran off with her phone (CPD RD# JC264202). GVO Exhibit 11G:2. A witness indicated she saw the incident and saw the offender jump into the white Jeep, which fled. *Id.* About 20 minutes later, at 1:46 p.m., defendant was arrested from the fleeing white Jeep as outlined above. GVO Exhibit 11A:5. The victim from CPD RD# JC264202 (the 1:22 p.m. robbery where the victim was knocked down to the ground) identified her stolen phone case as the one located in that stolen white Jeep. GVO Exhibit 11G:2.

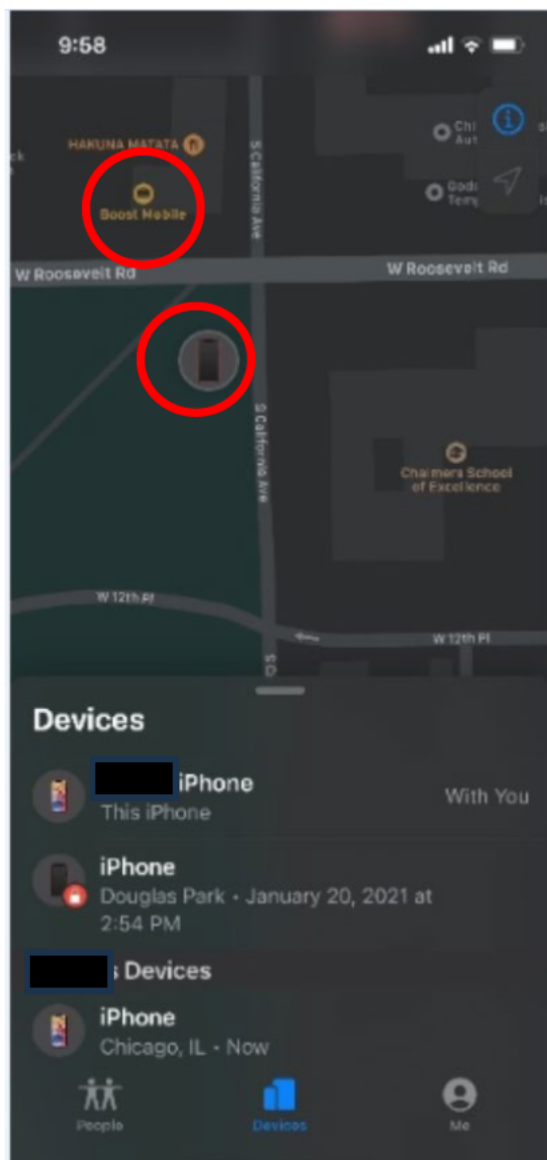
Below is a summary timeline of the incidents described above using the same stolen white Jeep Cherokee:

1. May 14, 2019, 10:45 a.m.: carjacking of white Jeep Cherokee
2. May 14, 2019, 3:00 p.m.: pedestrian phone robbery
3. May 14, 2019, 6:15 p.m.: pedestrian attempted phone robbery

4. May 14, 2019, 7:10 p.m.: pedestrian phone robbery (defendant identified)
5. May 15, 2019, 1:20 p.m.: pedestrian phone robbery (defendant identified)
6. May 15, 2019, 1:22 p.m.: pedestrian phone robbery
7. May 15, 2019, 1:46 p.m.: defendant arrested from the fleeing white Jeep upon encounter with CPD

Selling Stolen Phones

Similarly, as part of the armed carjacking to which defendant pled guilty in the instant offense, defendant admitted that he stole Victim A's phone on January 20, 2021. R.162:3. Defendant attempted to sell this stolen phone at a Boost Mobile store at Roosevelt and California. *Id.* Specifically, defendant exchanged Facebook messages with Facebook user "Solo Dolo," who is fellow Beamteam gang member Taevon Abston, on January 20, 2021, a few hours after he committed the armed carjacking and stole Victim A's phone. Defendant told Solo Dolo, "I need to sell the phone i just got gang." When asked where, defendant sent an audio message stating, "on Roosevelt and California." Solo Dolo asked, "That boost," and defendant responded, "Yea." Below is a screenshot showing the pinged location of Victim A's phone near the Boost Mobile store at Roosevelt and California the day of the armed carjacking:



As outlined in more detail in the GVO, evidence indicated that defendant went to that same Boost Mobile location and sold (and tried to sell) phones on multiple occasions, including in January 2021 (the same time the armed carjacking in the instant case occurred).

Pedestrian Armed Robbery Just Prior to Instant Offense: January 20, 2021

On January 20, 2021, at approximately 6:29 a.m., a victim reported that while he was walking, a Dodge Journey drove up and stopped in front of him, blocking his

way (CPD RD#JE11724). GVO Exhibit 2:3. The passenger, wearing all black and a black face mask, exited the Dodge Journey, grabbed the victim, pushed the victim to the ground, pointed a black handgun at his head, and demanded his car keys. *Id.* The victim complied, and the offender jumped back in the vehicle, which then fled northbound on Wacker. *Id.* Seven minutes after this armed robbery occurred, defendant, who was the passenger in that stolen Dodge Journey, committed the instant armed carjacking 0.1 miles away on Wacker Drive in front of Willis Tower, while also wearing a black face mask. R.162.

Just prior to both of these armed robberies, Facebook messages reflect that co-defendant Edmond Harris went to pick up defendant. Specifically, Harris told defendant he was “Omw [on my way].” Defendant asked Harris, “U in car bro,” to which Harris responded, “Duh,” and defendant wrote, “Ight.” At 5:59 a.m., Harris wrote to defendant, “Come out,” to which defendant responded, “Ight,” followed by Harris telling defendant to “Hurry up” at 6:01 a.m., just before the armed robbery and armed carjacking occurred as described above. There are no other Facebook messages between the two for the next couple hours.

Just after this armed carjacking occurred, co-defendant Harris continued in the stolen Dodge Journey to Oak Park, where he attempted to carjack another victim. Unlike the victim at Willis Tower who complied, the victim in Oak Park resisted, resulting in co-defendant, and fellow Beamteam gang member, Harris shooting the victim in the face. Defendant was not present for this carjacking; however, defendant’s Facebook post that day (shown below and referenced above as well), just

a few hours after he committed the Willis Tower armed carjacking, demonstrated his gang's intent to take risks—to take a life—if necessary.

Posted 2021-01-20 14:16:52 UTC

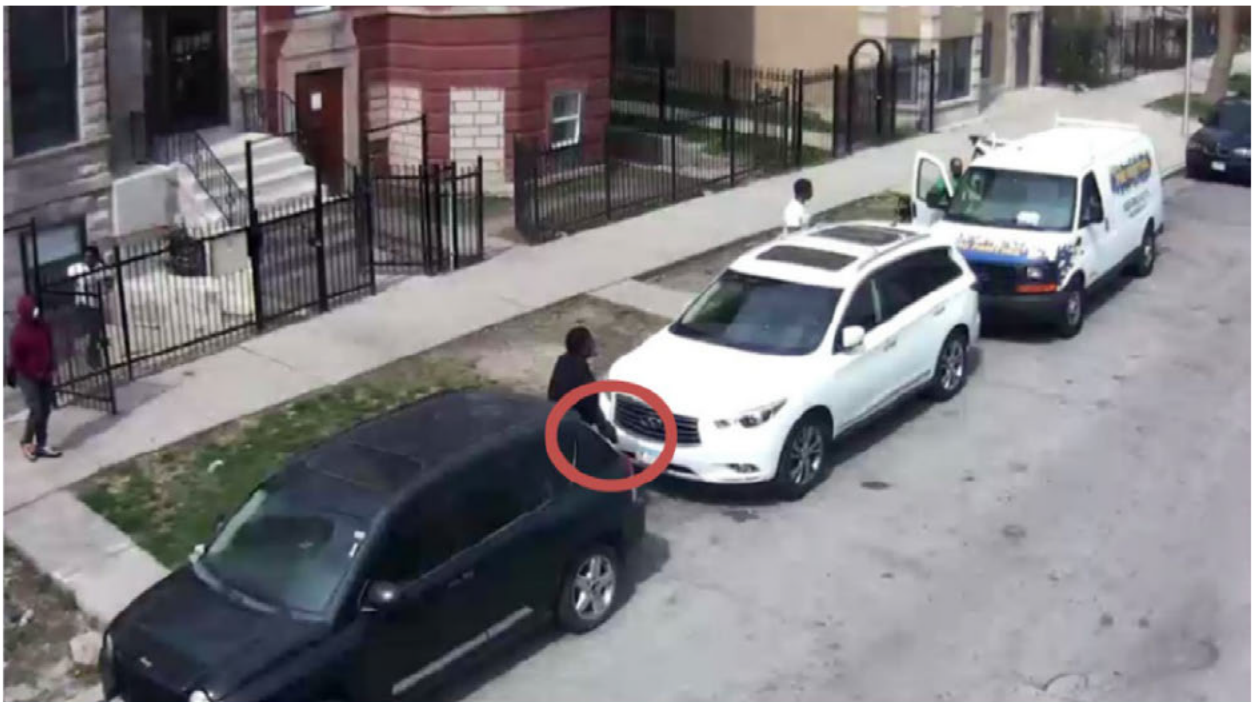
Status Can't be scared to take a life 🗡️👹 we already taking risks 🤔👤👊👊 #Goodmorning

Mobile true

Id 694353637924020|

Unlawful Possession of Firearm on Lawndale: April 7, 2021

Defendant was also arrested on April 7, 2021, during which time defendant was seen by law enforcement on the 1200 block of Lawndale (hence the reference to “1200” and Beamteam in defendant’s Facebook posts referenced above) possessing a firearm, pulling it out to be at the ready as a car passed by. Although this case against defendant was disposed as nolle prosequi by the State, defendant’s unlawful possession of a firearm, due to his status as both a convicted felon and being on probation, was captured by pole camera footage (GVO Exhibit 5 and GVO Exhibit 6), as indicated also by screenshots of that footage below:



Spree of Dunkin' Donuts Armed Robberies & Murder: February 9, 2021

On February 9, 2021, defendant went on a multi-victim violent crime spree with two fellow Beamteam gang members, as described in more detail in the GVO

and the government's sealed supplemental sentencing memorandum. During a Facebook exchange occurring on the same day as these crimes, defendant sent a voice message to an individual admitting, in relevant part, "On Jay, I ain't even gonna lie to you, I been robbin' people all morning . . . I just told my grandma the same thing, but I been robbin' people all morning." Exhibit 2.

[See "Background: Other Aggravating Factors" Section of Sealed Supplemental Sentencing Memorandum for Additional Facts]

Not a "Follower"

In the same vein, contrary to defendant's claims, he was not simply a "follower." Indeed, defendant has several times been the instigator in wanting to "hit licks" and harassed other people to join him, including complaining about others who did not engage in enough gang activity, and complaining about being left behind. See below for some examples (in addition to those outlined above):

Sent 2021-02-08 03:22:11 UTC
Body No I don't wanna talk wtf dude I just said I'm sick

Author Solo Dolo (Facebook: 100026364942260)
Sent 2021-02-08 03:22:34 UTC
Body Don't got time to agrue with u

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-02-08 03:24:11 UTC
Body Solo missed your call.

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-02-08 03:27:06 UTC
Body Bro I'm just saying i can't see yo pipe

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-02-08 03:27:32 UTC
Body And the heys

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-02-08 03:31:38 UTC
Body Solo missed your call.

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-02-08 03:31:47 UTC
Body Solo missed your call.

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-02-08 03:31:56 UTC
Body Bro

Author Solo Dolo (Facebook: 100026364942260)
Sent 2021-02-08 03:32:04 UTC
Body On lil Corey Stop calling me

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-02-08 03:39:49 UTC
Body Solo missed your call.

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-02-08 03:40:12 UTC
Body Solo missed your call.

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-02-08 03:50:52 UTC
Body Let's go get some licks

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-02-08 03:54:47 UTC
Body Or we csn do done we goy 2 cars

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-02-08 03:56:00 UTC
Body Solo missed your call.

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-02-08 03:58:09 UTC
Body Yo

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-01-31 16:19:21 UTC
Body Wya

Author Nfg Cage (Facebook: 100040903358667)
Sent 2021-01-31 16:19:30 UTC
Body Slot wyo

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-01-31 16:19:46 UTC
Body I'm trying hit some licks

Author Nfg Cage (Facebook: 100040903358667)
Sent 2021-01-31 16:19:54 UTC
Body Who car?

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-01-31 16:20:40 UTC
Body I'm about to make reck come out here

Author Joshua Walker (Facebook: 100020481704727)
Sent 2020-12-21 02:46:20 UTC
Body Y'all don't be out no more ☐☐

Author Solo Dolo (Facebook: 100026364942260)
Sent 2020-12-21 02:51:22 UTC
Body Fse they lame asl it's about that time they finna be calling

Author Solo Dolo (Facebook: 100026364942260)
Sent 2020-12-21 02:53:41 UTC
Body We got all these straps and don't wanna post up

Author Solo Dolo (Facebook: 100026364942260)
Sent 2020-12-21 02:53:56 UTC
Body I'll post with the 50 by myself on jay Onna porch ☐☐☐☐♂

Author Joshua Walker (Facebook: 100020481704727)
Sent 2020-12-21 02:54:40 UTC
Body Nah niggas want ride around with guns and not do shit

Author Joshua Walker (Facebook: 100020481704727)
Sent 2020-12-21 02:54:58 UTC
Body They do shit when they in the mood for it

Author Solo Dolo (Facebook: 100026364942260)
Sent 2020-12-21 02:55:35 UTC
Body Jay be killing them put them up when it's time to gangbang and that's they problem not being 100% in this shit

Author Joshua Moore (Facebook: 100020481704727)
Sent 2021-01-18 17:52:53 UTC
Body Mfs left me then i ask mfs to come get me they send me off so i stay in the slot

Author Myshawyn Echols (Facebook: 100006793545349)
Sent 2021-01-18 17:53:41 UTC
Body Should've texted me on jay ion be having mfers in my car like that☐☐I would've got you and glo

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-01-31 06:29:00 UTC
Body Send me yo number nun

Author Solo Dolo (Facebook: 100026364942260)
Sent 2021-01-31 06:29:22 UTC
Body [REDACTED]

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-01-31 06:29:33 UTC
Body ight

Author Solo Dolo (Facebook: 100026364942260)
Sent 2021-01-31 13:55:35 UTC
Body Wyd

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-01-31 13:55:49 UTC
Body Shit wassup

Author Solo Dolo (Facebook: 100026364942260)
Sent 2021-01-31 13:58:05 UTC
Body Trying to see what u doing today's

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-01-31 13:58:47 UTC
Body ldk gang it's i need some more money i need some licks

Author Solo Dolo (Facebook: 100026364942260)
Sent 2021-01-31 14:02:54 UTC
Body On jay

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-01-31 14:04:28 UTC
Body U don't got no mfs trying buy no pips rn

Author Solo Dolo (Facebook: 100026364942260)
Sent 2021-01-31 14:04:46 UTC
Body Hell nawl i balled my fb out

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-01-31 14:07:36 UTC
Body Damn

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-01-31 14:22:47 UTC
Body U got a way over here I'm trying see what's to this weed man

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-01-31 14:25:43 UTC
Body Them zans not shit im up early asl

Author Solo Dolo (Facebook: 100026364942260)
Sent 2021-01-31 14:27:54 UTC
Body U trying to rob him but lan got no way

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-01-31 14:28:06 UTC

Body Yea

Author Solo Dolo (Facebook: 100026364942260)
Sent 2021-01-31 14:28:46 UTC
Body C I been trying to do that

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-01-31 14:30:22 UTC
Body Man

[REDACTED]

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-01-31 04:14:59 UTC
Body I got 2 more woods

Author BigEddie Cane (Facebook: 100034043888348)
Sent 2021-01-31 04:15:06 UTC
Body Get me high

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-01-31 04:15:29 UTC
Body Bro we need more weed

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-01-31 04:25:21 UTC
Body I'm saying me and 3 about to go to bd house

Author BigEddie Cane (Facebook: 100034043888348)
Sent 2021-01-31 04:27:09 UTC
Body lte love

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-01-31 04:29:22 UTC
Body Love

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-01-31 06:23:46 UTC
Body If i get a car I'm come get u

Author BigEddie Cane (Facebook: 100034043888348)
Sent 2021-01-31 06:23:54 UTC
Body Who u with

Author BigEddie Cane (Facebook: 100034043888348)
Sent 2021-01-31 06:24:02 UTC
Body ?

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-01-31 06:24:22 UTC
Body Nah im in the slot rn I'm about to get with my breed homie

Author BigEddie Cane (Facebook: 100034043888348)
Sent 2021-01-31 06:51:27 UTC
Body Who what yall finna try to get car

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-01-31 06:51:51 UTC
Body Man they not on shit I'm in the house now

Author BigEddie Cane (Facebook: 100034043888348)
Sent 2021-01-31 07:16:36 UTC
Body Stop doing that shit

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-01-31 07:16:52 UTC
Body Stop doing what gang

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-01-31 07:17:32 UTC

Body
 We need some licks gang

Author BigEddie Cane (Facebook: 100034043888348)
Sent 2021-01-31 07:18:03 UTC
Body BigEddie sent a voice message.
Attachments audioclip-1612077482000-21873.mp4 (428013791875268)
Type audio/mp4
Size 235349
URL https://interncache-nao.fbsbx.com/v/t59.3654-2/1/144807601_428013795208601_9121813956618479689_n.mp4/audioclip-1612077482000-21873.mp4?ccb=3&nc_sid=7272a8&efg=eyJ1cmxNZW4iOiJwaHBfdXJsZ2VuX2NsaWVudC9lbnRpdHkvbWVzc2FnZV9hdWRpbjY9&nc_ht=interncach-nao.fbsbx.com&oh=3206adedcb405094687cf9a00fb42fa2&oe=60288A48&dl=1

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-01-31 07:18:49 UTC
Body You sent a voice message.
Attachments audioclip-1612077527000-10055.mp4 (133757245238416)
Type audio/mpeg
Size 83034
URL https://interncache-nao.fbsbx.com/v/t59.3654-2/1/143999124_133757248571749_8698207273077356259_n.mp4/audioclip-1612077527000-10055.mp4?ccb=3&nc_sid=7272a8&efg=eyJ1cmxNZW4iOiJwaHBfdXJsZ2VuX2NsaWVudC9lbnRpdHkvbWVzc2FnZV9hdWRpbjY9&nc_ht=interncach-nao.fbsbx.com&oh=4b673d0549feea385a49699f9e22c90c&oe=6028FDCD&dl=1

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-01-31 07:19:44 UTC
Body You sent a voice message.
Attachments audioclip-1612077582000-4807.mp4 (1040627173124911)
Type audio/mpeg
Size 40136
URL https://interncache-nao.fbsbx.com/v/t59.3654-2/1/144855336_1040627176458244_8504500300677588809_n.mp4/audioclip-1612077582000-4807.mp4?ccb=3&nc_sid=7272a8&efg=eyJ1cmxNZW4iOiJwaHBfdXJsZ2VuX2NsaWVudC9lbnRpdHkvbWVzc2FnZV9hdWRpbjY9&nc_ht=interncach-nao.fbsbx.com&oh=51f4a715591f266ba0d4439ee984d34c&oe=6028BEB3&dl=1

Author BigEddie Cane (Facebook: 100034043888348)
Sent 2021-01-31 07:20:50 UTC
Body BigEddie sent a voice message.
Attachments audioclip-1612077649000-23615.mp4 (426080475172048)
Type audio/mp4
Size 248845
URL https://interncache-nao.fbsbx.com/v/t59.3654-2

In the above exchange, after defendant tells co-defendant Harris (username BigEddie Cane) that “We need some licks gang,” defendant sends Harris an audio message, “Bro, I’m not fucking slow bro, who the fuck you think you’re talking to, but I’m saying fool, we need find some motherfuckers to take us to get some cars damn gang.” Exhibit 3. Defendant then indicates he wants to get up early and go do something, then later complained because Harris failed to get him up:

1/143860821_426080478505381_85755019561
95653375_n.mp4/audioclip-1612077649000-236
15.mp4?ccb=3&_nc_sid=7272a8&efg=eyJ1cmx
nZW4iOiJwaHBfdXJsZ2VuX2NsaWVudC9lbnRpdH
kvbWVzc2FnZV9hdWRpbyj9&_nc_ht=interncach
e-nao.fbsbx.com&oh=e7362c3d73fce8af7cc051
3fa51d595c&oe=602901EC&dl=1

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-01-31 07:21:50 UTC
Body You sent a voice message.
Attachments audioclip-1612077708000-8917.mp4 (408129833808425)
Type audio/mpeg
Size 73752
URL https://interncache-nao.fbsbx.com/w/t59.3654-21/144344897_408129837141758_8814424138456031788_n.mp4/audioclip-1612077708000-8917.mp4?ccb=3&_nc_sid=7272a8&efg=eyJ1cmxnZW4iOiJwaHBfdXJsZ2VuX2NsaWVudC9lbnRpdHkvbWVzc2FnZV9hdWRpbyj9&_nc_ht=interncache-nao.fbsbx.com&oh=fe42d0a678a646a6a54ae72c036bac9b&oe=6028A9E5&dl=1

Author BigEddie Cane (Facebook: 100034043888348)
Sent 2021-01-31 07:22:40 UTC
Body BigEddie sent a voice message.
Attachments audioclip-1612077759000-4923.mp4 (275426410585172)
Type audio/mp4
Size 97422
URL https://interncache-nao.fbsbx.com/w/t59.3654-21/143804089_275426417251838_6683666010470987216_n.mp4/audioclip-1612077759000-4923.mp4?ccb=3&_nc_sid=7272a8&efg=eyJ1cmxnZW4iOiJwaHBfdXJsZ2VuX2NsaWVudC9lbnRpdHkvbWVzc2FnZV9hdWRpbyj9&_nc_ht=interncache-nao.fbsbx.com&oh=d755395a7956d0e980573508b5f29f4a&oe=6029085A&dl=1

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-01-31 07:23:32 UTC
Body Ight u just wake me up let me know what u on bro fr i need some morey to i got 800 put out of 1500

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-01-31 16:38:38 UTC
Body So u out early and didn't call me fuck u to then bitch

Author BigEddie Cane (Facebook: 100034043888348)
Sent 2021-01-31 16:39:29 UTC
Body Bro that was a dream ☹☹

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-01-31 16:39:52 UTC
Body Right and them zans not nun on jay

Author BigEddie Cane (Facebook: 100034043888348)
Sent 2021-01-31 16:40:00 UTC
Body On jay ☹☹

Author Joshua Walker (Facebook: 100020481704727)
Sent 2021-01-31 16:40:14 UTC
Body U see I'm up this early on jay

Not only is defendant not simply a follower, but he has also had the wherewithal to hide evidence, as indicated by his own words in the Facebook messages outlined below:

Author Jman Johnson (Facebook: 100010498248645)
Sent 2020-08-24 15:45:42 UTC
Body The police found yo shit fr or they put sum on u?

Author Joshua Walker (Facebook: 100020481704727)
Sent 2020-08-24 16:19:52 UTC
Body They didn't found shit they keep searching me i put that shit in the toilet

Author Jman Johnson (Facebook: 100010498248645)
Sent 2020-08-24 16:20:31 UTC
Body U not wrong so wat they charged u with

Author Joshua Walker (Facebook: 100020481704727)
Sent 2020-08-24 18:20:10 UTC
Body Delivery

Defendant also plainly felt free to not join on some robbery spree, indicating that he was not simply a follower for everything and could exercise decision-making:

<p>Author Solo Dolo (Facebook: 100026364942260) Sent 2021-01-27 19:16:10 UTC Body Saw my story</p> <p>Author Joshua Walker (Facebook: 100020481704727) Sent 2021-01-27 19:17:01 UTC Body ok</p> <p>Author Solo Dolo (Facebook: 100026364942260) Sent 2021-01-27 19:28:12 UTC Body That mean lan got no job nomo dumb ass</p> <p>Author Joshua Walker (Facebook: 100020481704727) Sent 2021-01-27 19:29:14 UTC Body what u talking about</p> <p>Author Solo Dolo (Facebook: 100026364942260) Sent 2021-01-27 19:29:21 UTC Body They fired me</p> <p>Author Solo Dolo (Facebook: 100026364942260) Sent 2021-01-27 19:29:31 UTC Body Finna try to get unemployment</p> <p>Author Solo Dolo (Facebook: 100026364942260) Sent 2021-01-27 19:29:38 UTC Body Cause i miss 5 days Stairght</p> <p>Author Joshua Walker (Facebook: 100020481704727) Sent 2021-01-27 19:29:46 UTC Body on what []</p> <p>Author Joshua Walker (Facebook: 100020481704727) Sent 2021-01-27 19:30:10 UTC Body wow so wya now</p> <p>Author Solo Dolo (Facebook: 100026364942260) Sent 2021-01-27 19:30:43 UTC Body On jay and inna house where else</p> <p>Author Joshua Walker (Facebook: 100020481704727) Sent 2021-01-27 19:31:16 UTC Body wyo</p> <p>Author Solo Dolo (Facebook: 100026364942260) Sent 2021-01-27 19:32:01 UTC Body Tryna to rob everybody</p> <p>Author Solo Dolo (Facebook: 100026364942260) Sent 2021-01-27 19:32:06 UTC Body [][]o</p> <p>Author Solo Dolo (Facebook: 100026364942260) Sent 2021-01-27 19:32:10 UTC Body Or anything</p> <p>Author Joshua Walker (Facebook: 100020481704727) Sent 2021-01-27 19:32:36 UTC</p>	<p>Body nah u have fun doing that buddy</p> <p>Author Solo Dolo (Facebook: 100026364942260) Sent 2021-01-27 19:33:17 UTC Body Ok [][]</p> <p>Author Solo Dolo (Facebook: 100026364942260) Sent 2021-01-28 16:34:12 UTC Body Wyd</p> <p>Author Joshua Walker (Facebook: 100020481704727) Sent 2021-01-29 13:01:33 UTC Body Wyd</p> <p>Author Solo Dolo (Facebook: 100026364942260) Sent 2021-01-29 13:07:38 UTC Body i miss u</p> <p>Author Joshua Walker (Facebook: 100020481704727) Sent 2021-01-29 14:25:35 UTC Body i miss u to pussy</p> <p>Author Solo Dolo (Facebook: 100026364942260) Sent 2021-01-29 15:11:31 UTC Body No u don't u disappearing and shit</p> <p>Author Joshua Walker (Facebook: 100020481704727) Sent 2021-01-29 15:13:17 UTC Body boa u knew where i was at man when im not on fb for some days that men im with that bitch [][] everybody know that gang wyo tho</p> <p>Author Solo Dolo (Facebook: 100026364942260) Sent 2021-01-29 17:17:47 UTC Body Anything wyo</p> <p>Author Joshua Walker (Facebook: 100020481704727) Sent 2021-01-29 17:22:32 UTC Body Im in car with reck</p> <p>Author Solo Dolo (Facebook: 100026364942260) Sent 2021-01-29 19:18:58 UTC Body How long he gone be out hea</p> <p>Author Joshua Walker (Facebook: 100020481704727) Sent 2021-01-29 19:19:20 UTC Body He left boa im with bd and lil ed</p> <p>Author Solo Dolo (Facebook: 100026364942260) Sent 2021-01-29 19:29:23 UTC Body Doing what</p> <p>Author Joshua Walker (Facebook: 100020481704727) Sent 2021-01-29 19:29:41 UTC Body Bro wyo stop acting question</p> <p>Author Solo Dolo (Facebook: 100026364942260) Sent 2021-01-29 20:25:23 UTC</p>
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II. GUIDELINES CALCULATIONS

Probation calculated the guidelines to result in a total offense level of 19 and a criminal history category of II (based on two criminal history points), resulting in a guidelines imprisonment range of 33 to 41 months' imprisonment as to Count Two (PSR ¶102). Additionally, defendant is subject to a statutory mandatory minimum sentence of 7 years' imprisonment as to Count Three, which must run consecutively to any other sentence imposed (PSR ¶¶100-101). Defendant is also facing up to 3 years' supervised release as to Count Two and up to 5 years' supervised release as to Count Three (*see* PSR ¶104). The government agrees these are the correct guidelines ranges.

III. ARGUMENT

When taking into consideration the factors outlined in 18 U.S.C. § 3553(a), including the nature and circumstances of the offense and the history and characteristics of defendant, the government recommends a mid-range guidelines sentence of 38 months' imprisonment, plus the 7-year mandatory consecutive sentence, for a total 122-month sentence. This sentence is sufficient, but not greater than necessary, to reflect the seriousness of the offense, to promote respect for the law, to provide just punishment, to afford adequate deterrence to criminal conduct, and to protect the public from further crimes of the defendant.

The offense conduct in this case, *i.e.*, the nature and circumstances and seriousness of the offense, is sufficiently grave on its own, without even considering the other aggravating factors listed above. Defendant carjacked a hard-working individual who had just dropped off a Lyft rider, brandishing a gun at his head, at 6:30 a.m. in downtown Chicago. Thankfully, the victim complied and turned over his

vehicle and phone to defendant. As the victim of the Oak Park attempted carjacking well knows, any resistance likely would have resulted in an attempted murder, if not murder, as evident by defendant's own words in his Facebook post just a few hours after he committed this armed carjacking:

Posted 2021-01-20 14:16:52 UTC

Status Can't be scared to take a life 🦋👹 we already taking risks 😊👊🏻👊🏻 #Goodmorning

Mobile true

Id 694353637924020|

While the seriousness of this violent offense, standing alone, would justify the guidelines range the government is seeking, this offense, in conjunction with the aggravating factors above and in the PSI, also justify such a sentence in order to promote respect for the law, provide just punishment, afford adequate deterrence, and protect the public from defendant's further crimes.

This is not defendant's first rodeo. He has been previously convicted of two felony offenses involving stolen vehicles and robbery; notably, he received criminal history points for only one of these (PSI ¶¶51-52). Moreover, while on probation for these offenses, defendant violated his probation twice, and his probation was terminated as unsatisfactory in both cases (PSI ¶¶51-52). In fact, many of the photographs posted above with defendant in possession of firearms were while he was on probation for these offenses—doubly unlawful because not only was defendant precluded from possessing a firearm while a convicted felon, but also because he was on probation and violating the Court's orders. Through his actions, defendant has

shown this Court he is unwilling or unable to abide by court orders and is therefore a high risk to recidivate.

Throughout the course of this case, at various times defendant has attempted to mitigate his actions as simply “a follower,” stemming from a learning disability. Additionally, defendant’s grandmother has characterized defendant as “a follower” and easily influenced “by people in the streets” (PSI ¶79). The government had previously received documentation from defense, including an individualized education plan for defendant from Chicago Public Schools which identified defendant with a *mild* learning disability back in 2019 (*see also* PSI ¶¶93-94). In that paperwork, there was no indication that he was a follower of any sort. To the contrary, it stated that defendant “gets along well with a select group of peers. He is able to get along with adults *when he wants to*” and that he “is able to conduct himself in a positive manner with peers and adults but his social skills descend into a less-than-desirable range when he is asked to do something that is not of his choosing.” Those are not the descriptors of a follower. Defendant was also described as using his size to “bully” other students and adults, including threatening and aggressive responses to school security. Moreover, the Facebook messages outlined above do not reflect defendant as a follower.

Defendant’s grandmother, understandably, also claims that his current detainment has “really changed him” and that he is willing to “give up the friends that have mislead him” (PSI ¶79). First, defendant’s current detainment does not appear to have changed him. In fact, defendant has failed to show any growth during

his detention. While detained, he has received disciplinary action for the following 12 infractions (PSI ¶7):

1. Being out of place during lockdown (September 2, 2022 & July 8, 2023)
2. Fighting (November 5, 2022, April 15, 2024, & July 6, 2024)
3. Interfering with/refusing to lockdown (August 9, 2023, November 20, 2023, & July 13, 2024)
4. Participating in a hunger strike (December 4, 2023 & December 5, 2023)
5. “Cheeking” medication (May 1, 2024)
6. Smoking (March 14, 2025)

Notably, these did not all occur well in the past, many of these are recent, including in 2024 and one as recent as approximately a month ago. Additionally, defendant has not attended or completed any of the programs available at the detention center, nor has he been a pod worker or trustee (PSI ¶7). This does not suggest that defendant is on the right path—he has not taken advantage of any programs while incarcerated to better himself or prepare himself to pursue a lawful existence once released. To the contrary, he has committed multiple infractions, continuing to demonstrate that he is unable to follow the law and/or rules, even while under supervision and scrutiny. Moreover, instead of taking advantage of programs while detained, he has chosen instead to start gambling and has indicated he will continue to gamble upon release (PSI ¶89). The fact that defendant has chosen to gamble and commit infractions instead of taking advantage of programs to prepare himself for a successful reintegration into society is troubling. Before his detention, defendant had barely worked for four months because he simply did not like getting up everyday and going to different locations, and he was not used to a job (PSI ¶95); once he is released, he is going to have to make significant lifestyle changes in order to succeed—none of which he seems interested in doing or even making strides in while incarcerated.

That does not bode well. Second, it is unclear how giving up the friends that misled him will put defendant on the right path. If he is truly a follower as defense has claimed, then meeting individuals involved in poor behavior will simply lead him right back down a bad path, whether they are his old friends or new ones.

The other aggravating factors above, including the social media posts, demonstrate that defendant did not simply get caught up in a bad moment, nor is he simply a follower. Defendant was an active member of the violent Beamteam gang, engaging in criminal acts, sometimes initiating the desire to commit “licks,” demonstrating more than just a willingness to go along and participate, showing his ability to not just be a follower, and also choosing to sometimes decline to participate.

[See “Argument” Section of Sealed Supplemental Sentencing Memorandum for
Additional Argument]

While the government recognizes that defendant experienced some challenges during his childhood, including his brief stint in foster care, defendant was able to live with his grandparents since the age of approximately 9 years old (PSI ¶¶69-70). Although his grandfather was not really a father figure, defendant experienced no physical, emotional, or sexual abuse during his childhood (PSI ¶¶69-70). Defendant witnessed his mother drinking; however, his grandparents have no substance abuse or mental health issues (PSI ¶¶71, 73). Defendant’s health is excellent, and he has no mental health disorders (PSI ¶¶80, 85). Defendant claims he witnessed acts of violence and was sometimes afraid to leave the house (PSI ¶72). Normally, while that might be a mitigating factor to consider, it has been made aggravating here in that, even having witnessed the impact that violence had on himself and others, he

nevertheless chose to engage in repeated acts of violence, perpetuating the impact and trauma of violence on others, knowing and having experienced the impacts himself. This shows a callous depravity and lack of empathy towards others and increases his risk of danger to the community.

While defendant had some challenges in his childhood and a mild learning disability, he has nevertheless had significant family support that others in similar circumstances do not, he experienced no abuse, has excellent health, and had no mental health disorders. Yet, even with that background and having witnessed violence first-hand, he chose to commit a heinous violent crime, expressing a callous disregard for human life; in addition, he has demonstrated a lack of respect for the law, the Court's orders while on probation, and the rules while detained. Defendant has also shown his savviness and willingness to commit violent crimes, without simply being a follower. And he has failed to show a commitment to making a change in his life backed up by any concrete action.

Therefore, weighing the significant aggravating factors in this case against the mitigating factors, the government believes that a mid-guidelines range sentence of 38 months' imprisonment, followed by a mandatory consecutive 7 years' imprisonment, totaling 122 months' imprisonment, in this case would be appropriate under the § 3553(a) factors. This sentence would reflect the seriousness of the offenses as outlined above; promote respect for the law and not allow such heinous and violent conduct to proceed without repercussions; and provide just punishment for armed carjackings. Moreover, this sentence would serve to protect the public from further crimes of defendant, which is plainly necessary here where, not only has he

consistently unlawfully possessed firearms in addition to committing this violent offense, but he also plainly has been involved in a number of other incidents involving firearms beyond just the instant offense and his prior arrests/convictions. And his prior convictions have utterly failed to deter him from committing additional crimes, even while on probation. He continues to defy rules while incarcerated as well, having committed not just a few, but a dozen, infractions. Such a sentence will also serve to have a deterrent impact on others.

Regarding supervised release, the government recommends five years' total of supervised release, and the government agrees with Probation regarding all of the recommended conditions to be imposed. This would promote the continued respect for the law, afford adequate deterrence, and protect the public from any potential further crimes by defendant, which is plainly necessary, for the reasons cited above. Defendant also needs this period of supervised release to assist with his successful transition into society upon his release, especially considering that he has previously violated his terms of probation and failed to take any positive, affirmative actions during his incarceration thus far.

IV. RESTITUTION & VICTIM IMPACT STATEMENTS

Pursuant to 18 U.S.C. § 3663A, defendant is liable to pay restitution to the victim of his offense, Victim A, to be determined by the Court. Upon receipt of specific restitution requests, the government will timely provide the information to Probation. Additionally, upon receipt of any victim-impact statements, the government will timely provide those statements to Probation as well.

V. CONCLUSION

For these reasons, the government respectfully requests that the Court impose a total term of imprisonment of 122 months' imprisonment (consisting of 38 months as to Count Two, followed by a mandatory consecutive 7 years' imprisonment as to Count Three), 5 years' supervised release, and a \$200 special assessment.

Respectfully submitted,

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Dated: May 1, 2025